

EXHIBIT U

From: [Steve Schwarz](#)
To: ["Christopher Betke"](#); ["Jaclyn Wanemaker"](#); ["Maria T. Mastriano"](#)
Cc: [Matthew Belanger](#); [Teagan C. Dolan](#)
Subject: RE: Marcellin and Estate of Hollowell v. HP and Staples - Second Request to Schedule Meet and Confer on Outstanding Discovery
Date: Monday, May 8, 2023 9:15:57 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image010.png](#)

Please provide dates and times for a meet and confer to discuss the outstanding discovery responses from your clients. Thank you.

Stephen G. Schwarz, Esq.

Managing Partner

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1882 South Winton Road, Suite 1
Rochester, NY 14618
Direct : (585) 399-6035
Phone : (585) 325-5150
Fax : (585) 325-3285

sschwarz@faraci.com

www.faraci.com



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From: Steve Schwarz

Sent: Thursday, May 4, 2023 2:19 PM

To: Christopher Betke <cgbetke@coughlinbetke.com>; Jaclyn Wanemaker <jwanemaker@smithsovick.com>; Maria T. Mastriano <mmastriano@pmtlawfirm.com>

Cc: Matthew Belanger <mbelanger@faraci.com>; Teagan C. Dolan <TDolan@faraci.com>

Subject: Marcellin and Estate of Hollowell v. HP and Staples

Counsel

Plaintiffs served their Second Requests for Production and Second Set of Interrogatories on Defendants on March 29, 2023. More than thirty days have elapsed since service and no responses have been served. Please provide dates next week for a meet and confer to discuss when this discovery will be produced and when we can reschedule the depositions of the plaintiffs, and the Rule 30(b)(6) depositions of defendants. Motions to compel must be filed by May 31 and fact discovery is scheduled to conclude on June 30. We are obviously not going to complete fact discovery by that date, so we also need to discuss an extension of those deadlines. Please provide dates for a meet and confer next week at your earliest convenience.

Steve

Stephen G. Schwarz, Esq.

Managing Partner

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